

**FILED - GR**

November 18, 2009 2:05 PM

TRACEY CORDES, CLERK  
U.S. DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
BY: EC /

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No.

**1:09-cr-349**

v.

Hon.

**Janet T. Neff**

**U.S. District Judge**

BARBARA J. HOLLOWELL,

**INDICTMENT**

Defendant.

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The Grand Jury charges:

**COUNT 1**

**(THEFT FROM ORGANIZATION RECEIVING FEDERAL FUNDS -- CREDIT CARD FRAUD)**

Beginning on or about January 14, 2007, and continuing to on or about June 10, 2008, in Berrien County, in the Southern Division of the Western District of Michigan, the defendant,

**BARBARA J. HOLLOWELL,**

being an agent of the Benton Harbor Housing Commission, an agency of State or local government that received in the one-year period beginning January 1, 2007, benefits in excess of \$10,000.00 under a Federal program involving a grant, contract, subsidy or other form of Federal assistance, embezzled, stole, obtained by fraud and without authority knowingly converted to her use or the use of another not the rightful owner, property worth at least \$5,000.00 owned by, and under the care and custody of the Benton Harbor Housing Commission, that is, in excess of \$12,000.00 in personal charges to a Benton Harbor Housing Commission credit card issued to her in her capacity as Executive Director and paid for with money from the various accounts of the Benton Harbor Housing Commission.

18 U.S.C. § 666(a)(1)(A)

**COUNT 2**

**(THEFT FROM ORGANIZATION RECEIVING FEDERAL FUNDS -- CONNECTUP! GRANT)**

Beginning on or about June 10, 2008, and continuing to on or about July 11, 2008, in Berrien County, in the Southern Division of the Western District of Michigan, the defendant,

**BARBARA J. HOLLOWELL,**

being an agent of the Benton Harbor Housing Commission, an agency of State or local government that received in the one-year period beginning January 1, 2008, benefits in excess of \$10,000.00 under a Federal program involving a grant, contract, subsidy or other form of Federal assistance, embezzled, stole, obtained by fraud and without authority knowingly converted to her use or the use of another not the rightful owner, property worth at least \$5,000.00 owned by, and under the care and custody of the Benton Harbor Housing Commission, that is, over \$8,000.00 in cash withdrawals and charges to a credit/debit card associated with a grant awarded to the Benton Harbor Housing Commission by the Benton Harbor ConnectUp! Program.

18 U.S.C. § 666(a)(1)(A)

**COUNT 3**

**(SOCIAL SECURITY FRAUD -- FAILURE TO REPORT EARNINGS WHILE  
RECEIVING EARLY RETIREMENT BENEFITS)**

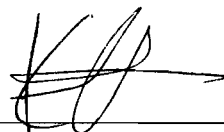
Beginning in or about January 2004, and continuing without interruption until in or around August 2007, in Berrien County, in the Western District of Michigan, Southern Division, and elsewhere,

**BARBARA J. HOLLOWELL,**

having knowledge of the occurrence of an event affecting her initial or continued right to receipt of Social Security Early Retirement Benefits, concealed and failed to disclose such event with an intent fraudulently to secure payment either in a greater amount than was due or when no payment was authorized. Specifically, defendant returned to work after applying for early retirement benefits and failed to disclose and concealed her earnings from the Social Security Administration in order to initially receive and continue to receive early retirement benefits under Title II of the Social Security Act to which she knew she was not entitled.

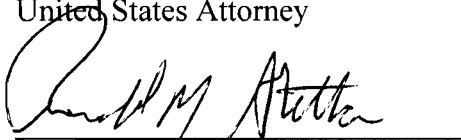
42 U.S.C. § 408(a)(4)(1)

A TRUE BILL



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GRAND JURY FOREPERSON

DONALD A. DAVIS  
United States Attorney



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RONALD M. STELLA  
Assistant United States Attorney